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7 **UNITED STATES DISTRICT COURT**

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**CENTRAL DISTRICT OF CALIFORNIA**

9 VPN.COM LLC, : Case No.: 2:2022-cv-04453  
10 Plaintiff, :  
11 vs. : **Stipulation to Set Aside Default and re**  
12 GEORGE DIKIAN, QAING DU, AND : **Deadline to Respond to Complaint**  
13 JOHN DOE, :  
14 Defendants. : [FRCP 55(c); L.R. 7-1]  
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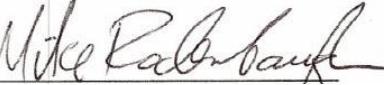
18 F.R.C.P. 55(c) provides that the Court may set aside the clerk's entry of default for  
19 good cause. The parties hereby stipulate to excuse the default by Defendant George Dikian,  
20 due to the nature and complexity of the Plaintiff's allegations and newly incoming counsel  
21 for Defendant George Dikian needing extra time to investigate the matter.

22 The parties further hereby stipulate that Defendant George Dikian shall answer or  
23 otherwise respond to Plaintiff's Complaint no later than December 9, 2022. This stipulation  
24 does not alter any Scheduling Order of the Court.  
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1 IT IS SO STIPULATED.

2 RESPECTFULLY SUBMITTED, December 1, 2022.

3 RODENBAUGH LAW

4 By:   
5 Mike Rodenbaugh

6 *Attorneys for Defendant*  
7 *George Dikian*

8  
9 LEWIS & LIN LLC

10 By: /Brett Lewis/  
11 Brett Lewis

12 *Attorneys for Plaintiff VPN.com LLC*